

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

WOMBLE BOND DICKINSON (US) LLP

Ericka F. Johnson (NJ #032162007)

1313 N. Market Street, Suite 1200

Wilmington, Delaware 19801

Phone: (302) 252-4337

Email: ericka.johnson@wbd-us.com

Attorneys for Ad Hoc Committee of States

In re:

LTL MANAGEMENT, LLC,

Debtor.

Case No.: 21-30589 (MBK)

Chapter: 11

Hearing Date:

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

The Applicant, Womble Bond Dickinson, LLP, counsel to and on behalf of the Ad Hoc Committee of States Holding Consumer Protection Claims (the “Ad Hoc Committee of Member States”)¹ requests that the time period to/for the Motion of the Ad Hoc Committee of States Holding Consumer Protection Claims Seeking Relief With Respect to the Order Establishing Mediation Protocol, filed on the date hereof, as required by Fed. R. Bankr. P. 2002 and D.N.J. LBR 9013-2, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reason(s) set forth below:

1. Shortened notice for the hearing is requested because:

¹ The Ad Hoc Committee of States is in the process of forming and the member states may be modified through the filing of an amended Notice of Appearance or other applicable filing. The current members of the Ad Hoc Committee of States (“Member States”) are: Alabama, Alaska, Arkansas, Arizona, Colorado, Connecticut, Delaware, Florida, Hawaii, Idaho, Illinois, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Rhode Island, South Dakota, Texas, Utah, Vermont, Virginia, Washington, Washington, D.C., West Virginia and Wisconsin.

a. The forty (40) states and one district that are members of the Ad Hoc Committee of States collectively hold consumer protection claims that are significant, encompassing civil penalties that, based on the statutory maximum per violation, could in principle run into the trillions of dollars. These claims are independent of, and in addition to, any claims available to individual users of talc products or claims of state or governmental entities that are not Member States.

b. The unique character of the Member States and the magnitude of their claims warrant the Ad Hoc Committee of Member States' participation in the negotiations and mediation of the Debtor's plan. The Order Establishing Mediation Protocol ("Mediation Order"), in its current form, would make such participation extremely difficult, if not impossible.

c. The Court has scheduled two other motions to reconsider the Mediation Order for hearing on April 12, 2022, filed by the Office of the United States Trustee (Dkt. 1912) and Travelers Casualty and Surety Company (Dkt. 1900). In the interest of efficiency and fairness, the Ad Hoc Committee of Member States requests that its Motion be heard at the same time.

2. State the hearing dates requested: April 12, 2022 at 10:00 a.m.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

The applicant respectfully requests entry of the proposed order shortening time.

Dated: April 1, 2022

/s/ Ericka F. Johnson
Ericka F. Johnson (NJ #032162007)
1313 N. Market Street, Suite 1200
Wilmington, Delaware 19801
Phone: (302) 252-4337
Email: ericka.johnson@wbd-us.com

Attorneys for Ad Hoc Committee of States

